

JUL 6 - 2016

Mark Nadel

Federal Communications Commission
Office of the Secretary

From: Schott, Mark <MSchott@tuscbbdd.org>
Sent: Tuesday, July 05, 2016 12:12 PM
To: Mark Nadel
Subject: FCC Appeal - Additional Information per Today's Phone Conversation
Attachments: 2016 Cases for TuscBDD.pdf

CC Docket No. 02-6

Mark:

Attached are the case threads from May and June of this year. We had a 3rd case number from March, #67473 because we were blocked from applying for form 470. That was resolved fairly quickly.

You will note on the #89796 case thread that we were advised on May 27 to discard our incomplete form 471 application. Actually, we had attempted to open a 2nd form 471 application since the first one was stalled, so both applications were deleted. We were then told that no new information had been received on May 27th even though we had just provided additional information. We were instructed to re-open the case, but that option was not available, so we opened case #92541.

On case #92541, the problem with the entity information was finally resolved on June 13. It would have been extremely simple if we could have entered the information requested on the 471 application screen, but that was not an option.

For the purpose of improving the USAC system for next year, I would add that much of the information we entered from the previous 5 years automatically carried forward, but some key pieces did not. On the issue of the omission of being an independent school in a rural area, the online instructions were to go to "Manage Organization" and we could make changes and corrections. However, the only changes we could make on that screen were to addresses and phone numbers. The information that we had to change to continue was not available on that screen.

Part of the frustration with the USAC system was we would work on our application, exit to acquire information, and then attempt to re-enter. We usually could enter a 2nd time, but on the 3rd time we were blocked with a "concurrent sessions" message and that ended our work on that day. That also occurred when we responded to the emails from USAC indicating that our case record had been changed. We would click on the link to check the update and we would be blocked with the "concurrent sessions" message. What is the advantage to preventing an applicant from entering the system more than twice in one day?

Some of the questions the application asked included no explanation or detail of what was needed, nor was there a description in the 97 pages of instructions. For example, it asked how many circuits we had. Ok, what kind of circuits? Electrical circuits, telephone circuits, broadband circuits? Does a trunk line count as multiple circuits? Is each telephone number considered a circuit?

The eRate process has always been somewhat confusing, but the new version they launched this year was even worse.

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Please let us know if additional information is needed. Thank you for listening!

Mark B. Schott

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